

**UNITED STATES COURT OF APPEALS
DISTRICT OF COLUMBIA CIRCUIT**

SHARIF MOBLEY,

Appellant,

v.

CENTRAL INTELLIGENCE
AGENCY, *et al.*,

Appellees.

Case No. 13-5286

* * * * *

**APPELLANT’S UNOPPOSED *NUNC PRO TUNC*
MOTION FOR ENLARGEMENT OF TIME
WITHIN WHICH TO FILE HIS REPLY BRIEF**

NOW COMES Appellant to respectfully and regretfully request a one-day extension—until 11 August 2015—of his deadline for filing his Reply Brief, which was due 10 August 2015. Appellees do not oppose this Motion.

Appellant requests this extension due to excusable neglect. The undersigned was on schedule to complete this filing (as well as another filing, an opposition to summary affirmance in *National Security Counselors, Inc. v. DOJ*, No. 15-5117) on time this evening when a technical error resulted in the deletion of several hours’ worth of work in the nearly-completed brief.¹ He then devoted approximately three

¹ Specifically, he accidentally closed the Word file without saving changes, thinking he was closing another open file with a similar name (which he was using for

hours to unsuccessfully attempting to recover the lost work before giving up and focusing on completing his brief in the other case using another computer, ultimately filing it a little over two hours late. After completing that filing, he returned to his primary computer and continued his recovery efforts, which are still underway as he writes this Motion on another computer. He plans to spend approximately another hour on this recovery effort before executing a final program which will run overnight, performing a low-level intensive scan of the computer searching for raw data. He will then retire for the evening and finish writing this brief, either using data recovered by the overnight scan or recreating it from scratch, during the day tomorrow.

Shortly after he started the recovery process, the undersigned was able to reach Appellees' counsel, who stated that Appellees did not oppose this Motion.

reference and did not want to overwrite), and for some reason the AutoRecover file which Microsoft Word was set up to create periodically cannot be found on the computer.

Date: August 11, 2015

Respectfully submitted,

/s/ Kelly B. McClanahan

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